

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

V.

THOMAS C. GOLDSTEIN,

Defendant

CRIMINAL NO. LKG-25-6

MOTION TO SEAL

The United States of America, by its undersigned attorneys, moves this Honorable Court to order that the Government's Opposition to Defendant's Appeal of Amended Conditions of Release be placed under seal. The Government's Opposition and exhibits contain sensitive personal information. Under the Protective Order in this case (ECF 29), such sensitive personal information must be filed under seal. Accordingly, the Government is filing a sealed version and a redacted version of its Opposition and exhibits, removing such protected information from public view.

To justify sealing, the Government must demonstrate that: (1) there is a compelling government interest requiring materials to be kept under seal, and (2) there is no less restrictive means—such as redaction—available. *In re Search Warrants Issued on April 26, 2004*, 353 F.Supp.2d 584 (D. Md. 2004). The procedures for sealing are set forth in *Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989). “The judicial officer may explicitly adopt the facts that the government presents to justify the sealing.” *Id.* at 65. Although notice of the sealing order is required, the notice requirement is satisfied by the docketing of the order sealing the documents. *See id.*

Here, there is a compelling interest to keep sensitive personal information under seal, as recognized in the Court's Protective Order (ECF 29), and the Government is providing both sealed and redacted versions.

WHEREFORE for the foregoing reasons, the Government requests that the Court order that the Government's Opposition to Defendant's Appeal of Amended Conditions of Release be placed under seal and accept the redacted version for filing.

Respectfully submitted,

Kelly O. Hayes
United States Attorney

/s/

Patrick D. Kibbe
Assistant United States Attorney
District of Maryland

Stanley J. Okula, Jr.
Senior Litigation Counsel
Department of Justice—Tax Division

Emerson Gordon-Marvin
Hayter Whitman
Trial Attorneys
Department of Justice—Tax Division